

Declaration of D.F.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

New York Immigration Coalition, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, President of the
United States, in his official capacity, *et al.*,

Defendants.

**CIVIL ACTION NO:
25-cv-01309-MMG**

DECLARATION OF D.F.

I, D.F., upon my personal knowledge, hereby submit this declaration pursuant to

28 U.S.C. § 1746 and declare as follows:

1. I am more than 18 years of age and competent to testify, upon personal knowledge, to the facts set forth herein.
2. I am currently a resident of Westchester County, NY. I am a native of Colombia.
3. I moved to the United States after fleeing from Colombia. I have a current asylum claim pending.

4. My partner, the father of my unborn child, is also a native of Colombia. He has a current asylum claim pending.
5. We are both unable to return to Colombia because we fear we will be persecuted.
6. I am currently six months pregnant.
7. I fear that my child will be subjected to discrimination and bullying growing up without U.S. citizenship.
8. I fear that my unborn child will not have any status, rights, or ability to access educational programs as a result of the Executive Order. I am concerned that my child will live in limbo like their parents.
9. I feel it is unjust to subject a child born in the United States to such cruelty.
10. I believe that babies should be born in peace. Under the Executive Order, I believe children will be born and enter the United States with the same prejudice against them that their noncitizen parents experience.
11. My partner and I want our child to be able to receive a U.S. passport and Social Security card once they are born. We are worried because we do not know if it will be possible for our child to obtain documents affirming their U.S. citizenship if the Executive Order takes effect.

12. My partner and I are also worried about the treatment of our child if they do not receive U.S. citizenship. We fear that our child will not have rights in this country if the Order takes effect.
13. I am worried that participating in this lawsuit as an individual plaintiff will expose me to retaliation by the U.S. government. Specifically, I am concerned that the U.S. government might deny, delay, or interfere with my asylum application because of my participation in this lawsuit.
14. I do not want my participation in this lawsuit to jeopardize my own ability—and, even more importantly, my unborn child's ability—to remain in the United States.
15. I provide this declaration in support of Plaintiffs' motion for a preliminary injunction to enjoin enforcement and implementation of the Executive Order banning birthright citizenship.
16. I am Spanish-language dominant. This document which was prepared in English was translated for me into Spanish. I read and understand its contents.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: March 18, 2025

Respectfully submitted,

D.F.

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